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**Verified Complaint**

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF SOUTH CAROLINA – COLUMBIA DIVISION

Miyuki Maureen Johnson, Trustee for

MMJ Enterprise Foreign Express Trust,

Civil Action No. 3:25-cv-06161-JFA-SVH

Plaintiff,

v.

Dominion Energy South Carolina, Inc.,

Defendant.

**COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF**

Plaintiff, Miyuki Maureen Johnson, acting as Trustee for the MMJ Enterprise Foreign Express Trust, files this Verified Complaint against Dominion Energy South Carolina, Inc., and alleges as follows:

1. Plaintiff is the duly appointed Trustee of the MMJ Enterprise Foreign Express Trust, a private irrevocable trust entity with a principal address at 401 McNulty Street, STE #345, Blythewood, SC 29016.

2. Defendant Dominion Energy South Carolina is a utility provider with a principal mailing address of PO Box 25973, Richmond, VA 23260-5973.

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3. On or about May 2025, Plaintiff submitted a lawful A4V (Accepted for Value) remittance and trust discharge packet in full settlement of the outstanding utility account: Account No. 9-2101-2320-8477, totaling \$446.79.

4. Defendant received the lawful trust discharge documents, including remittance, affidavit, UCC-1 lien, and trust certification, and failed to respond within the 72-hour lawful response period or the additional 15-day window required for rebuttal under commercial law.

5. Despite receipt and constructive notice, Defendant continued to demand fiat payment, threatened service interruption, and ignored all lawful documentation.

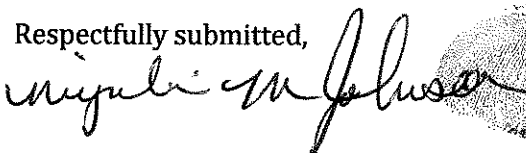
6. Defendant's dishonor of lawful remittance constitutes a violation of Uniform Commercial Code sections 3-603 and 3-311, breach of contract, interference with trust rights, civil abuse, and discriminatory action under the ADA (42 U.S.C. § 12101 et seq.).

7. Plaintiff is a retired federal employee and disabled individual, entitled to legal accommodation and reasonable protection from abusive and unlawful billing or disconnection practices.

WHEREFORE, Plaintiff demands judgment against Defendant as follows:

- (a) For damages in the amount of \$100,000;
- (b) For injunctive relief preventing further billing or disconnection threats;
- (c) For costs of suit and court fees;
- (d) For any other relief the Court deems just and proper.

Respectfully submitted,



Miyuki Maureen Johnson

Trustee, MMJ Enterprise Foreign Express Trust

401 McNulty Street, STE #345

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**Notary Acknowledgment**

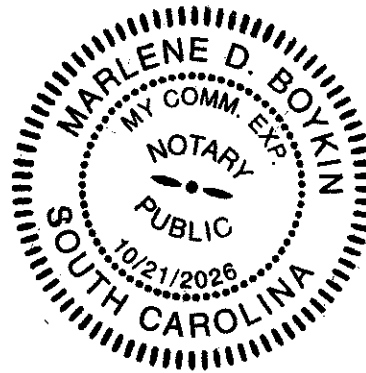
State of South Carolina

County of Richland

Subscribed and sworn before me this 22<sup>nd</sup> day of June, 2025, by Miyuki Maureen Johnson, who is personally known to me or produced valid identification.

Marlene D. Boykin

Notary Public

My Commission Expires: 10/21/2026

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Blythewood, SC 29016

[Notary page attached]

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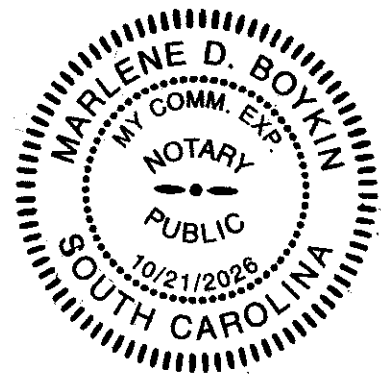
**Notary Acknowledgment**

State of South Carolina

County of Richland

On this June 20, 2025, before me appeared Miyuki Maureen Johnson, known to me (or satisfactorily proven) to be the person whose name is subscribed to this instrument, and acknowledged that she executed it as Trustee of MMJ Enterprise Foreign Express Trust.

Notary Public: Marlene D. Boykin  
My Commission Expires: 10/21/2026



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